

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-08300018-2012**  
Application Received: **September 19, 2011**  
Plant Identification Number: **083-00018**  
Permittee: **Energy Corporation of America**  
Facility Name: **Mabie Compressor Station**  
Mailing Address: **P. O. Box 459, Buckhannon, WV 26201**

*Revised: N/A*

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Physical Location:	Cassity, Randolph County, West Virginia
UTM Coordinates:	557.70 km Easting • 4297.90 km Northing • Zone 17
Directions:	From Old US Rt. 33 in Buckhannon, proceed approximately 15 miles to Secondary Rt. 53 (Pumpkintown-Coalton Road). Turn right on Secondary Rt. 37/8 and proceed through the town of Mabie. Make a right onto Secondary Rt. 35 for 5.5 miles to a sharp left hand curve in Cassity. Station access road goes to the right on a gravel road in this curve.

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### Facility Description

The Mabie Station is a natural gas transmission facility covered by NAICS 48210 and SIC 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of two (2) 250-hp and one (1) 600-hp natural gas fired reciprocating engines, one (1) emergency generator, and five (5) storage tanks of various sizes.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2010 Actual Emissions</b>
Carbon Monoxide (CO)	195.20	96.63
Nitrogen Oxides (NO <sub>x</sub> )	115.97	57.41
Particulate Matter (PM <sub>10</sub> )	0.50	0.247
Total Particulate Matter (TSP)	1.02	0.25
Sulfur Dioxide (SO <sub>2</sub> )	0.031	0.01
Volatile Organic Compounds (VOC)	1.55	1.30
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2010 Actual Emissions</b>
Formaldehyde	1.08	0.53

*Some of the above HAPs may be counted as PM or VOCs.*

### Title V Program Applicability Basis

This facility has the potential to emit 195.20 TPY of CO and 115.97 TPY of NO<sub>x</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Energy Corporation of America is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart ZZZZ	RICE
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
None		

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

### Determinations and Justifications

**Equipment Changes:** This permit renewal includes the addition of the following equipment:

1. A 100 gallon pipeline liquids storage tank installed in 2006 (A04).
2. A 630 gallon used oil tank installed in 2010 (A05).

Neither of these tanks requires additional requirements in this permit renewal.

Also tanks B02 and B03 were removed.

**40 C.F.R. 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE):** The facility maintains four spark ignition, natural gas fueled reciprocating engines—three compressors and a generator. These engines are covered by 40 C.F.R. 63, Subpart ZZZZ provisions. The compliance date for the rule provisions is October 19, 2013 with initial notification on or prior to February 16, 2011.

E01, E02, and G1 are classified as non-emergency spark-ignition four-stroke rich burn stationary engines rated below 500 HP located at an area source of HAPs. These engines are covered by the provisions of 40 C.F.R. 63, Subpart ZZZZ as follows:

- These engines must comply with the emission limitations in 40 C.F.R. §63.6603 and Table 2d to this subpart. These limits were added as condition 4.1.1.a.
- These engines must comply with the continuous compliance requirements in 40 C.F.R. §§63.6605 and 6640. These requirements were added as conditions 4.1.1.c and h, 4.5.1, and 4.5.2.
- These engines must comply with the general provisions of 40 C.F.R. part 63. Except per 63.6645(a)(5), the following do not apply: 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h). This requirement was added as condition 4.1.1.d.
- These engines must be operated in compliance with the monitoring, installation, collection, operation, and maintenance requirements of 40 C.F.R. §§ 63.6625(e), (h), and (j). These requirements were added as condition 4.2.1.
- These engines must be operated in compliance with the recordkeeping requirements of 40 C.F.R. §§63.6655(a), (b), (d), and (e). These requirements were added as condition 4.4.1.

E03 is classified as a non-emergency spark-ignition four-stroke rich burn engine rated at over 500 HP located at an area source of HAPs that operates over 24 hr/year. This engine must comply with the following 40 C.F.R. 63, Subpart ZZZZ provisions:

- This engine must comply with the emission limitations in 40 C.F.R. §63.6603 and Table 2d to this subpart. These limits are also included with condition 4.1.1.a.
- This engine must comply with the operating limitations in 40 C.F.R. §63.6603 and Table 1b to this subpart. These limits were added condition 4.1.1.b.
- This engine must comply with the initial compliance requirement in 40 C.F.R. §63.6630 and Table 5 to this subpart. This requirement was added as condition 4.1.1.f.
- In addition to the continuous compliance requirements specified for the other engines (40 C.F.R. §§63.6605 and 6640), this engine must be operated in accordance with 40 C.F.R. §63.6635. This requirement was added as condition 4.1.1.g.
- This engine must comply with all general provisions of 40 C.F.R. part 63. This requirement was added as condition 4.1.1.e.
- These engines must be operated in compliance with the monitoring, installation, collection, operation, and maintenance requirements of 40 C.F.R. §§ 63.6625(a), (b), (h), and (k). These requirements were added as condition 4.2.2.
- This engine must be tested in accordance with 40 C.F.R. §§ 63.6612, 63.6615, and 63.6620 and Tables 3, 4, and 5 to this subpart. These requirements were added as condition 4.3.1.
- This engine must be operated in compliance with the recordkeeping requirements of 40 C.F.R. §§63.6655(a), (b), and (d). These requirements were added as condition 4.4.2.
- For this engine, the permittee must comply with the notification requirements in 40 C.F.R. §63.6645. This requirements was added as condition 4.5.3.
- For this engine, the permittee must comply with the reporting requirements in 40 C.F.R. §§63.6650(a), (b), (c), (d), (e), and (f). These requirements were added as condition 4.5.4.

**Greenhouse Gas Tailoring Rule:** This is a renewal Title V Permit and there have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

## Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR21	Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. Mabie station is not located in Cabell, Kanawha, Putnam, Wayne, or Wood counties that are affected by 45CSR21.
45CSR27	To Prevent and Control the Emissions of Toxic Air Pollutants. Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment "used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight."
40 C.F.R. 60 Subpart GG	Standards of Performance for Stationary Gas Turbines. There are no turbines at the Mabie Compressor Station.
40 C.F.R. 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. All tanks storing volatile organic liquids are below 75 m <sup>3</sup> in capacity.
40 C.F.R. 60 Subpart KKK	Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants. Mabie station is not engaged in the extraction of natural gas from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
40 C.F.R. 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO <sub>2</sub> Emissions. There are no sweetening units at the Mabie station.
40 C.F.R. 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines. There are no turbines at the Mabie Compressor Station.
40 C.F.R. 63 Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. The Mabie Compressor Station is not subject to Subpart HH since Mabie Compressor Station is not a natural gas production facility.
40 C.F.R. 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. The Mabie Compressor Station is not subject to Subpart HHH since the station does not have a dehydration facility as well as the station is not a major source of HAPs.
40 C.F.R. Part 64	The facility does not have any pollutant specific emissions units (PSEU) at this facility that satisfy all of the applicability criteria requirements of 40 C.F.R. §64.2(a), i.e., that: 1) have pre-control regulated pollutant potential emissions (PTE) equal to or greater than the "major" threshold limits to be classified as a major source; 2) are subject to an emission limitation or standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.

## Request for Variances or Alternatives

None.

## Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

## Comment Period

Beginning Date: December 27, 2011  
 Ending Date: January 26, 2012

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Point of Contact**

Rex Compston, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

Comment from the EPA: Condition 4.5.2 states "...in table 8 of this subpart that applies." I would suggest changing it to "...in table 8 of 40 C.F.R 63, subpart ZZZZ that applies" for clarity.

This suggested change was made.